



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
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CHICAGO, ILLINOIS 60604

EPA Region 5 Records Ctr.



313990

REPLY TO THE ATTENTION OF: SR-6J

VIA ELECTRONIC MAIL AND US POSTAL SERVICE

Monday, November 20, 2006

Linda E Hicken  
RMT, Inc  
744 Heartland Trail  
Madison, Wisconsin 53717-1934

RE: Allied Paper/Portage Creek/Kalamazoo River Site  
Plainwell Mill RI/FS  
Preliminary Comments: Health and Safety Plan

Dear Ms. Hicken:

In September 2006, RMT, Inc. provided a *Draft Health and Safety Plan* (HASP) on behalf of Weyerhaeuser Company, in accordance with the *Consent Decree for the Design and Implementation of Certain Response Actions At Operable Unit #4 and the Plainwell Inc. Mill Property of the Allied Paper, Inc/Portage Creek/Kalamazoo River Superfund Site* (CD). Below, please find Region 5's preliminary comments and recommendations regarding the draft HASP, dated September 2006:

1. Section 1, page 1-1. The text states: "This HSP is a dynamic document Subcontractors will be required to submit HSPs applicable to their prescribed activities." If the HSP is approached in this manner, there will be more than one safety plan on-site, a situation Region 5 believes can cause confusion. In order to maintain uniformity among the various subcontractors, Region 5 recommends that RMT create a single HSP plan that all subcontractors will follow at the site.
2. Risk Analysis, Section A, page 2-3. It is not clear why the work does not include a mandatory client H&S orientation. Region 5 recommends that an explanation be provided for this statement.
3. Risk Analysis, Section B, page 2-5. The table indicates that the IDLH and PEL values for phenanthrene are not available. IDLH and PEL values for phenanthrene can be located in the NIOSH Pocket Guide to Chemical Hazards, dated September 2005. Region 5 recommends that these values be included in the HASP.
4. Risk Analysis, Section B, page 2-5. The text states: "The work schedule may be modified if the ambient temperature is higher than 80°F." Region 5 recommends that this value be confirmed and the correct references be provided.

5. Trenching and Excavations. Excavations are identified in the Risk Analysis, and trenching/excavation procedures are provided as an appendix, but the special tasks section (page 3-1, last line) does not indicate any construction/demolition activities. Also, the training section (Pages 3-2 and 3-3) does not indicate any excavation training or competent person requirements. Region 5 recommends that RMT modify the HSP to include any construction/demolition activities; describe any excavation training that will be provided; and identify the competent person criteria.
6. Visitor Safety Checklist, page 3-4. The text states: "Note the location of Visitors, Exclusion, and Support Zones (Refer to Figures 1 through 4 for proposed activity areas)." The activity areas are not delineated on the map.
7. Personal Protection, page 3-6. The text states that "Level D or modified Level D will be the standard level of PPE required for the pre-design activities." The HASP should provide the type of garment which will be used for modified Level D protection.
8. Air Monitoring. The Plan has no provisions for air monitoring. Most of the chemicals identified as present on the site are metals or non-volatile organics (PCBs and PAHs), which cannot be monitored by direct-reading instruments. However, the risk assessment also identifies PERC and trimethylbenzene, which could be monitored using a PID.
9. Troxler Radiation Safety, page 3-11. It is not clear if the ionizing radiation will be measured.
10. Emergency Equipment. An eye wash is identified as required equipment (Page 3-15), but is not included on the "Site Resources" table (Page 3-12).
11. Emergency Contacts, 3-13. The HASP does not contain emergency phone numbers for all emergency contacts. Emergency phone numbers for the emergency contacts must be identified before work begins.
12. Emergency Route, 3-13. The text states: "If possible, the planned emergency route should be driven at least once before fieldwork begins." The HASP does not specify where the hospital route map will be posted. Region 5 recommends that the location/ posting area of the hospital map be specified in the HASP.
13. Emergency Route, 3-13. It is not clear if the Borress Pipp Hospital is prepared to handle a hazardous material accident victim.
14. Investigations of Near Miss Incident and Initial Report of Incident/Exposure, page 3-15. The text states that "The incident report submittal operator (Jason Chevallard) will obtain the necessary information from the employee...." The

HASP does not contain Jason Chevallard's emergency phone number. Jason Chevallard's emergency phone number must be identified before work begins.

15. Severe Weather. Severe Weather is identified as a potential hazard in the risk analysis, but no procedures are provided in the HASP. At minimum, the HASP should provide that use of the Geoprobe and similar heavy equipment will be suspended when lightning has been sighted in the area.

In addition, please note that the Plainwell Mill has been designated as Operable Unit #7, not Operable Unit #6 as stated in various reports submitted in September 2006.

You should be aware that Region 5 has provided these comments and recommendations on the HASP in order to have work continue while the Region reviews other documents submitted by RMT, Inc on behalf of Weyerhaeuser Company. These recommendations do not constitute Region 5's comments on the *Work Plan* or the *Sampling and Analysis Plan*, and therefore do not trigger any requirement to submit revised drafts of either of these documents.

Thank you for your attention to this matter. Please do not hesitate to call me at 312.886.1434, should you have any questions related to the task.

Sincerely,



Sam Chummar, Remedial Project Manager  
U.S. EPA Region 5  
Superfund Division – Remedial Response Branch #1  
77 W Jackson Blvd. (SR-6J)  
Chicago, IL 60604

cc: Eileen Furey, C-14J  
Shari Kolak, SR-6J